# DOSH VPP APPLICATION GUIDELINES

**For Site Applicants:**  Use these guidelines to develop your VPP application. For efficient processing, your application needs to follow the format below. Address each item. In sections B - E, describe how each program element is implemented at your worksite.

Use the numbering system below to help speed the review of your application.

Where existing policies, guidelines, forms, etc., describe your programs, we encourage you to enclose them rather than to write new material for this application.

VPP applicants whose operations are covered by the Process Safety Management (PSM) Standard must provide responses to each question in the VPP PSM Questionnaire (Supplement “B”) that is applicable to their operations. Responses must cover all PSM-related operations and provide sufficient detail. The questionnaire can be found on the VPP site web page.

Please read each question and provide all information requested. For answers to your questions, or assistance in completing your application, call the number or write to the address below. Additional guidelines on preparing your application can be found at the OSHA web site <http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=DIRECTIVES&p_id=2976#chapter5>

Voluntary Protection Program

Division of Occupational Safety & Health (DOSH)

Department of Labor and Industries

Post Office Box 44649

Olympia, Washington 98504-4649

or call (360) 902-5431

After your completed application has been reviewed and found acceptable, you will be contacted to choose a convenient time for your pre-approval onsite review. During the onsite review, you will be evaluated on how effectively your safety and health program meets the specific needs of your site. Criteria used in the evaluation include how well your program has been planned, communicated, and implemented.

**Note:** No information from the VPP application will be used for enforcement purposes. Applicants wishing to withdraw their application may do so at any time.

**A. GENERAL INFORMATION**

The following general information needs to be filled in completely and legibly on the application.

**A.1. Applicant**

Applicant information needs to include the following:

* Site name
* Site address
* Site manager name
* Site manager’s title
* Site VPP contact for DOSH correspondence
* Site VPP contact’s title
* Phone number
* E-mail address

**A.2. Company/Corporate Name**

The site company name needs to include the following (make any corporate subsidiary relationships clear):

* Name (if different from above)
* Address
* VPP contact (if applicable)
* Site VPP contact’s title
* Phone number
* E-mail address

**A.3. Collective Bargaining Agent(s).**

If there is one or more collective bargaining organizations active at the site, be sure to list the following information for each one (list information on each separately):

* Union name and local #
* Agent’s name
* Address
* Phone number
* E-mail address

**A.4. Number of Employees and Contractor Employees.**

Provide the number of employees, both direct and contractor, at the site:

* Number of Employees working at Applicant’s site
* Number of Temporary Employees supervised by Applicant
* Number of Applicable Contractor Employees

**A.5. Type of Work Performed and Products Produced.**

Provide a comprehensive description of the work performed at your site, the type of products produced, and the type of hazards typically associated with your industry.

**A.6. Industrial Classification Codes.**

Provide what you believe to be your site’s 6-digit North American Industry Classification System (NAICS) code and your 4-digit Standard Industrial Classification (SIC) code.

Please contact your VPP Coordinator if you are having difficulty identifying an appropriate code.

You can also find NAICS and SIC information on the Bureau of Labor Statistics’ website, [*www.bls.gov*](http://www.bls.gov).

**A.7. Record Your Recordable Nonfatal Injury and Illness Statistics.**

**1. Statistics for Direct Employees.**

Using information from your OSHA injury and illness logs (OSHA-300), **complete and submit Table 1** in Section G at the end of this application.

Then, for your reference:

1. Record your combined 3-year average TCIR[[1]](#footnote-1) here: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
2. Record your combined 3-year average DART[[2]](#footnote-2) rate here: \_\_\_\_\_\_\_\_\_\_\_

Both your 3-year average TCIR and your 3-year average DART rate must be below the three year average of the 3 most recent years of specific industry national averages for nonfatal injuries and illnesses at the most precise level published by the U.S. Department of Labor’s Bureau of Labor Statistics (BLS). DOSH will compare all submitted rates against the three year BLS average for your NAIC

**2. Statistics for Contractor Employees.**

**Complete Table 2** on the application form for rates of Applicable Contractors[[3]](#footnote-3), listing each contractor individually. **Submit Table 2 with your application.**

You must also maintain this information at your worksite and make it available to the DOSH review team during the VPP onsite review.

**B. MANAGEMENT LEADERSHIP AND EMPLOYEE INVOLVEMENT**

Describe management leadership and employee involvement in your site’s safety and health program.

**B.1. Commitment.** Attach a copy of your top-level safety policy specific to your facility.

**Note:** Management must clearly demonstrate its commitment to meeting and maintaining the requirements of the VPP and taking ultimate responsibility for worker safety and health.

**B.2. Organization.** Briefly describe how your company’s safety and health function fits into your overall management organization. Attach a copy of your organization chart.

**B.3. Authority and Responsibility.** Describe what authority you give managers, supervisors, and regular employees regarding safety and health, and hazard mitigation.

**B.4. Accountability.** Describe your accountability system used to hold managers, line supervisors, and employees responsible for safety and health. Examples are job performance evaluations, warning notices, and contract language. Describe system documentation.

**B.5. Resources.** Identify the available safety and health resources. Describe the safety and health professional staff available, including appropriate use of certified safety professionals (CSP), certified industrial hygienists (CIH), other licensed health care professionals, and other experts as needed, based on the risks at your site.

Identify any external resources (including corporate office and private consultants) used to help with your safety and health management system.

**B.6. Goals and Planning.** Identify your annual plans that set specific safety and health goals and objectives. Describe how planning for safety and health fits into your overall management planning process.

**B.7. Self-Evaluation.** Provide a copy of the most recent annual self-evaluation of your safety and health management system. Include assessments of the effectiveness of the VPP elements listed in these application guidelines, documentation of action items completed, and recommendations for improvement. Describe how you prepare and use the self-evaluation.

**B.8. Employee Involvement.** List at least three meaningful ways employees are involved in your safety and health management system. These must be in addition to employee reporting of hazards. Provide specific information about decision processes in which employees participate, such as hazard assessment, inspections, safety and health training, and/or evaluation of the safety and health management system.

**B.9. Employee Notification.** Describe how you notify employees about site participation in the VPP, their right to register a complaint with DOSH, and their right to obtain reports of inspections and accident investigations upon request. (Methods may include new employee orientation; intranet or email if all employees have access; bulletin boards; toolbox talks; or group meetings.)

**B.10. Contract Workers’ Safety.** Describe the process used for selecting contractors to perform jobs at your site. Describe your documented oversight and management system for ensuring that all contract workers who do work at your site enjoy the same healthful working conditions and the same quality protection as your regular employees.

**B.11. Site Map.** Attach a site map or general layout of your operation.

**C. WORKSITE ANALYSIS**

**C.1. Baseline Hazard Analysis.** Describe the methods you use for baseline hazard analysis to identify hazards associated with your specific work environment, for example, air contaminants, noise, or lead.

Identify the safety and health professionals involved in the baseline assessment and subsequent needed surveys. Explain any sampling rationale and strategies for industrial hygiene surveys if required.

**C.2. Hazard Analysis of Routine Jobs, Tasks, and Processes.** Describe the system you use (when, how, who) for examination and analysis of safety and health hazards associated with routine tasks, jobs, processes, and/or phases. Provide some sample analyses and any forms used.

You should base priorities for hazard analysis on historical evidence, perceived risks, complexity, and the frequency of jobs/tasks completed at your worksite.

In construction, the emphasis must be on special safety and health hazards of each craft and phase of work.

**C.3. Hazard Analysis of Significant Changes.** Explain how, prior to activity or use, you analyze significant changes to identify uncontrolled hazards and the actions needed to eliminate or control these hazards. Significant changes may include non-routine tasks and new processes, materials, equipment, and facilities.

**C.4. Self-Inspections.** Describe your worksite safety and health routine general inspection procedures. Indicate who performs inspections, their training, and how you track any hazards through to elimination or control.

For routine health inspections, summarize the testing and analysis procedures used and qualifications of personnel who conduct them. Include forms used for self-inspections.

**C.5. Employee Reports of Hazards.** Describe how employees notify management of uncontrolled safety or health hazards. Explain procedures for follow up and tracking corrections. An opportunity to use a written form to notify management about safety and health hazards must be part of your reporting system.

**C.6. Accident and Incident Investigations.** Describe your written procedures for investigation of accidents, near misses, first-aid cases, and other incidents. What training do investigators receive? How do you determine which accidents or incidents warrant investigation? Incidents should include first-aid and near-miss cases. Describe how results are used.

**C.7. Pattern Analysis.** Describe the system you use for safety and health data analysis. Indicate how you collect and analyze data from all sources, including injuries, illnesses, near-misses, first-aid cases, work order forms, incident investigations, inspections, and self-audits. Describe how results are used.

**D. HAZARD PREVENTION AND CONTROL**

**D.1. Engineering Controls.** Describe and provide examples of engineering controls you have implemented that either eliminated or limited hazards by reducing their severity, their likelihood of occurrence, or both.

Engineering controls include, for example:

* Reduction in pressure or amount of hazardous material,
* Substitution of less hazardous material,
* Reduction of noise produced,
* Fail-safe design,
* Leak before burst,
* Fault tolerance/redundancy, and
* Ergonomic design changes.

**D.2. Administrative Controls.** Briefly describe the ways you limit daily exposure to hazards by adjusting work schedules or work tasks, for example, job rotation.

**D.3. Work Practice Controls.** Describe and provide examples of your work practice controls. These include, for example, workplace rules, safe and healthful work practices, specific programs to address WISHA standards, and procedures for specific operations that require permits, labeling, and documentation.

Identify major technical programs and regulations that pertain to your site, such as lockout/tagout, process safety management, hazard communication, machine guarding, and fall protection.

**D.4. Personal Protective Equipment.** Describe and provide examples of required personal protective equipment your employees use and what PPE the VPP team members will need to bring to your worksite.

**D.5. Enforcement of Safety and Health Rules.** Describe the procedures you use for disciplinary action or reorientation of managers, supervisors, and other employees who break or disregard safety and health rules.

**D.6. Preventive/Predictive Maintenance.** Summarize your written system for monitoring and maintaining workplace equipment to predict and prevent equipment breakdowns that may cause hazards. Provide a brief summary of the type of equipment covered.

**D.7. Occupational Health Care Program.** Describe your on-site and off-site medical service and physician availability. Explain how you utilize the services of licensed occupational health care professionals. Indicate the coverage provided by employees trained in first aid, CPR, and other paramedical skills, their training, and available equipment.

**D.8. Emergency Preparedness.** Describe your emergency planning and preparedness system. Provide information on emergency drills and training, including evacuations.

**E. SAFETY AND HEALTH TRAINING**

Describe the formal and informal safety and health training provided for managers, supervisors, and employees.

Identify training protocols, schedules, and information provided to supervisors and employees on programs such as hazard communication, personal protective equipment, and handling of emergency situations. Describe how you verify the effectiveness of the training given.

**F. ASSURANCES**

VPP applications must include a signed statement affirming that:

1. You will comply with the WISHA Act and correct in a timely manner all hazards discovered through self-inspections, employee notification, accident investigations, DOSH onsite reviews, process hazard reviews, annual evaluations, or any other means. You will provide effective interim protection, as necessary during any DOSH onsite review. DOSH Compliance will inspect any workplace that has had a fatality and may inspect an injury requiring in-patient hospitalization of any employee.
2. Within 90 days, you will correct safety and health deficiencies related to compliance with DOSH requirements and
3. Your employees support the VPP application. At sites with employees organized into one or more collective bargaining units, the authorized representative for each collective bargaining unit must either sign the application or submit a signed statement indicating that the collective bargaining agent(s) support VPP participation.
   * DOSH must receive concurrence from all such authorized agents to accept the application. At non-union sites, management’s assurance of employee support will be verified by the DOSH onsite review team during employee interviews.
4. VPP elements are in place and management commits to meeting and maintaining the requirements of the elements and the overall VPP.
5. Employees, including newly hired employees and contract employees, will receive orientation on the VPP, including employee rights under VPP and under the WISH Act.
6. You will protect employees given safety and health duties as part of your safety and health management system from discriminatory actions resulting from their carrying out such duties, just as the RCW 49.17.160 and WAC 296-800-120 protect employees who exercise their rights.
7. Employees will have access to the results of self-inspections, accident investigations, and other safety and health data upon request. At unionized construction sites, this requirement may be met through employee representative access to these results.
8. You will maintain your safety and health management system information and make it available for DOSH review to determine initial and continued approval to the VPP. This information will include:

* Any agreements between management and collective bargaining agent(s) concerning safety and health.
* All documentation enumerated under Section III.J.4. of the July 24, 2000 Federal Register Notice which pertains in part with Washington’s VPP requirements for VPP sites.
* Any data necessary to evaluate the achievement of individual Merit or 1-Year Conditional Star goals.

1. Each year by February 15, you will submit the following information to your designated DOSH VPP Coordinator:

**(1)Participant Rates.**

* + - * For the previous three calendar years, the average TCIR for injuries and illnesses, and the average DART rate (see tables at end of this appendix).
      * The total number of cases for each of the above two rates.
      * Hours worked and estimated average employment for the past full calendar year.

**(2)Contractor Rates.**

If you are a general industry, maritime or federal agency site, you will submit data on each applicable contractor. Applicable contractors are those employers who have contracted with you to perform certain jobs and whose employees worked a total of 1,000 or more hours in at least 1 calendar quarter at your worksite. The data will consist of:

* + - * The site’s TCIR and DART rate for each applicable contractor’s employees.
      * The total number of cases from which these two rates were derived;
      * Hours worked and estimated average employment for the past full calendar year.
      * The appropriate NAICS code for each applicable contractor’s work at the site.

**(3)Annual Self-Evaluation.**

Submit a copy of the most recent annual safety and health self-evaluation. Include a description of any success stories, such as reductions in workers’ compensation rates, increases in employee involvement, and improvements in employee morale.

**G. RATE CALCULATION AND TABLES**

Follow these steps to complete the table below. Submit the table with your application:

1. Provide the site’s North American Industry Classification System (NAICS) Code

C**onstruction Sites:** The site's NAICS code is determined by the type of construction project, not individual trades. Construction applicants must provide TCIR and DART rates. All workers, including all subcontractors who worked at the site, must be included in the calculation. The rates must reflect experience from time of site inception until time of application, but must be at least 12 months.

1. Provide the site’s Total Case Incident Rate (TCIR)

* For regular site employees, including temporary employees you supervise; provide rates for each of the last three complete calendar years plus the average for all three years combined.
* For contractors whose employees worked 1000 or more hours in any quarter at your site, provide one combined rate as described in 7.a. above for all contractors' employees who qualify.4

1. Provide the site’s Day Away/Restricted Work/Transferred Incident Rate (DART)
2. For regular site employees, including temporary employees you supervise; provide rates for each of the last three complete calendar years plus the average for all three years combined.
3. For contractors whose employees worked 1000 or more hours in any quarter at your site, provide one combined rate as described in 7.a. above for all contractors' employees who qualify.[[4]](#footnote-4)

Injury incidence Rates are calculated (N/EH) x 200,000 where:

N = number of recordable injuries/illness in one year. (OSHA 300 LOG Columns H+I+J)

EH = total number of hours worked by all employees in one year.

200,000 = equivalent of 100 full-time workers working 40 hour weeks, 50 weeks per year.

Days Away/Restricted Work Incident Rate is calculated with the same equation where:

N = number of injuries/illness resulting in days away from work and restricted work activity days. (OSHA 300 LOG Columns H+I)

1. Compare the three year TCIR and DART rate to the most recently published Bureau of Labor Statistics (BLS) national average (available online at *www.osha.gov/oshstats/work.html*) for the three or four digit (if available) SIC or the NAICS code for the industry in which the applicant is classified.
2. These national averages, currently broken down by SIC code, are found in the Table of Incidence Rates of Non-fatal Occupational Injuries and Illnesses by Industry of the BLS Occupational Injuries and Illnesses Bulletin that BLS publishes each year and can be found at OSHA website: [*www.bls.gov/iif/oshsum.htm*](http://www.bls.gov/iif/oshsum.htm)
3. BLS has changed from the SIC classification system to the North American Industry Classification System (NAICS), VPP rates will be compared to the rates generated under NAICS. To convert SIC into a NAICS go to the following BLS website: [*www.naics.com/search.htm*](http://www.naics.com/search.htm)
4. To calculate the percent above or below the national average use the following formula:

Site rate - BLS rate x 100

BLS rate

1. Use the following table to display the information requested above by using one table for your site employees and the other for contractors with more than 1000 hours in any one quarter of the last three years.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Year**  **Last three years** | **Total Work Hours** | **Average Annual Employment** | **Total Recordable Injury & Illness Cases** | **Days Away/**  **Restricted /Transfer Cases** | **Total Case Incidence Rate (TCIR)** | **Days Away/ Restricted and Transfer Incidence Rate (DART)** |
| 2006 |  |  |  |  |  |  |
| 2007 |  |  |  |  |  |  |
| 2008 |  |  |  |  |  |  |
| 3 Year Totals & Rates for  2006-2008 |  |  |  |  |  |  |
| Average of last available 3 years  BLS Rates for SIC/NAICS **\_\_\_\_\_\_\_\_** | | | | |  |  |
| Percent Above or Below BLS 3 year average rates | | | | |  |  |

1. **TCIR** is the **T**otal **C**ase **I**ncidence Rate for recordable nonfatal injuries and illnesses. [↑](#footnote-ref-1)
2. **DART rate** is the incidence rate for recordable injury and illness cases involving **D**ays **A**way from work, **R**estricted work activity, and/or job **T**ransfer [↑](#footnote-ref-2)
3. An **Applicable Contractor** has employees working 1,000 or more hours in at least 1 calendar quarter at the applicant’s site and is not directly supervised in day-to-day activities by applicant’s management. Construction applicants do not break out this category of site employee. If you are a construction applicant, include all contractor employees in the category of Temporary Employees and include them in your TCIR and DART rate. [↑](#footnote-ref-3)
4. **Submit applicable contractor rates with your application**, and also maintain them at the site for review by the DOSH VPP Team.

   **Approved participants submit applicable contractor rate data** each year as part of their annual submission to DOSH. [↑](#footnote-ref-4)